



# Maricopa County

Air Quality Department

Compliance Division 1001  
North Central Ave., Suite  
125 Phoenix, Arizona  
85004 Phone:  
602-506-6010 Fax:  
602-506-2163

Dear Responsible Party:

RE: Inspection Report - No Violation Noted

You are receiving this letter as a result of an inspection that was conducted at your site/facility. Enclosed with this letter is your Inspection Report to notify you of the results of your inspection.

The information located on the back page of this letter will clarify the acronyms and policies referenced in the Inspection Report. Further information about the Maricopa County Air Quality Department (MCAQD) Rules and Regulations can be found at the MCAQD website: [www.maricopa.gov/aq](http://www.maricopa.gov/aq)

Additional information about how you can improve air quality in Maricopa County can be found at [www.CleanAirMakeMore.com](http://www.CleanAirMakeMore.com)

If you have any questions, you may contact the inspector noted on your Inspection Report or contact a Maricopa County Air Quality Department Compliance Supervisor, at (602) 506-6734.

Thank you,

Air Quality Compliance Division  
602-506-6734

Acronyms used in the Inspection Report		
$\leq$ – Less than or equal to	CM – Certified Mail	NTV – Non Title V
$\geq$ – Greater than or equal to	COMS – Continuous Opacity Monitoring System	O&M Plan – Operations and Maintenance Plan
AAP – Area Accessible to the Public	DCP – Dust Control Plan	PC – Permit Condition
ACWM – Asbestos Containing Waste Material	DGO – Dust Generating Operation	RACM – Regulated Asbestos Containing Material
ASHARA – Asbestos School Hazard Abatement Reauthorization Act	ECS – Emissions Control System	RM – Regular Mail
AHERA – Asbestos Hazard Emergency Response Act	HAP – Hazardous Air Pollutant	Stab. – Stabilize
ATI – At the time of inspection	HAPRACT – Hazardous Air Pollutant Reasonable Available Control Technology	TO – Track Out
AZMACT – Arizona Maximum Achievable Control Technology	HT – Haul Truck	TOCD – Track Out Control Device
CARB – California Air Resource Board	N/A – Not Applicable	VEE – Visible Emissions Evaluation
CEMS – Continuous Emission Monitoring System	N/O – Not Observed	VOC – Volatile Organic Compound

The owner/operator is ultimately responsible for maintaining the site/facility in compliance with Maricopa County rules and regulations at all times.

# INSPECTION REPORT



Maricopa County Air Quality Department  
1001 N. Central Avenue, Suite 125  
Phoenix, AZ 85004  
Phone: (602) 506-6010 Fax: (602) 506-2537  
www.maricopa.gov/aq

Date: 11-Aug-14  
Start Time: 0800 hrs End Time: 0925 hrs  
Inspector: Shannon Klimek #92  
Phone: 602.527.6288  
Email: KlimekS@mail.maricopa.gov

Inspection Result:

## No Violations Noted

Inspection Type: Detail inspection On-site

Inspection Purpose: Complaint

Complaint Number: 256235

Permit/Notification Number:

040136

Hickman's Egg Ranch, Inc.

6515 S. Jackrabbit Trail

Buckeye

AZ 85326

Site Name: Hickmans Egg Ranch

Site Contact: Fernando Hoenig, Fertilizer Plant Operations Manager

Site Address:  
32425 W. Salome Hwy

City:  
Arlington, AZ

Phone: 623.764.4758  
Inspection Rights Notification:  
Read and Signed Rights

## Comments

Complaint-generated inspection for dust emissions at fertilizer plant operating at Hickman's Egg Ranch in Arlington, AZ. Complainant stated dust emissions from unidentified equipment and from uncovered bulk storage piles.

Complaint response off-site from 0755 hrs to 0800 hrs. This inspection commenced off-site at 0800 hrs. and on-site at 0840 hrs.; and detailed chronologically as follows:

From 0800 hrs to 0840 hrs:

I observed and photographed or recorded video of the following sources of visible emissions while off-site:

- 1) Dust emissions from bulk material handling near screen at fertilizer plant
- 2) Dust emissions from stack on dust collector on dryer at fertilizer plant
- 3) Dust emissions from fertilizer loading operation at fertilizer plant

I prepared to document Method 9 VE readings from #1. No observations of this particular activity were made. My initial observation of #1 had the fallout zone obscured by another bulk storage pile. I moved to northeast of my position off site but no further activity occurred for over 20 minutes. I recorded video of loading operation #3 in which a loader/lift was loading 1 ton bags of fertilizer into cargo area of haul truck. My recording ceased due to SD card memory limitation. Coincidentally, this particular activity ceased at this time as haul truck received last load of fertilizer, so no VE possible.

At 0829 hrs; I left a voice mail for permit contact, Francisco Ruiz 623-764-3878 informing of my complaint response.

At 0831 hrs; I telephoned Compliance Manager, Shari Yeatts 623-872-2358 and informed her of my complaint response and observations. Ms. Yeatts stated she was unable to meet with me on site and suggested I contact Fertilizer Plant Operations Manager, Fernando Hoenig at 623-764-4758.

At 0840 hrs; I telephoned Mr. Hoenig who immediately met with me on site.

I explained to Mr. Hoenig the purpose of my inspection and my observations.

Mr. Hoenig made the following statements:

- a) Each bag of processed fertilizer contained approximately 2000 lbs. of fertilizer.
- b) The fertilizer is sold for \$165.00 per ton FOB (Freight on buyer), meaning not including any freight charges, which are the responsibility of the buyer.
- c) The fertilizer bulk storage piles are required to be maintained at less than 12% moisture content to prevent the formation of pathogens. i.e. salmonella. [tarping or enclosing the bulk storage piles are potential fugitive dust control measures].
- d) Dust and smoke emissions from the dust collector occur only at startup.  
[I observed emissions from the stack at dust collector was 0% opacity at this time.]
- e) Many Hickman's Egg Ranch employees have received dust control training.  
[Mr. Hoenig showed me his Comprehensive 310 Training accreditation at this time.]

Comments
<p>f) Dust emissions observed from top of fertilizer silo could be abated by plugging; but caused caking of fertilizer which required frequent cleaning. [I informed additional ECS (Emission Control Systems) may alleviate emissions.]</p> <p>g) Dust emissions observed at bottom of silo had unknown point of emission.</p> <p>h) Composting activity and one Hickman's employee at South facility had been relocated to BioFlora north of Patterson Rd and West of Lewis Prison. Mr. Hoenig stated Luke Blotsky was his contact for BioFlora. Mr. Hoenig did not have an address for this facility.</p> <p>i) Compost is sold for \$35.00 per ton, with an estimated 5000 tons sold annually. Mr. Hoenig does not know any details of the business arrangements with BioFlora.</p> <p>I informed Mr. Hoenig that I was commencing an investigation for a potential violation for operating the fertilizer plant without a permit. I informed Mr. Hoenig the composting operations at BioFlora may also be operating without a permit.</p> <p>I photographed some of my observations on site; including silos, dryer, dust collector, cyclones and left the site.</p> <p>At 0944 hrs; I telephoned Mr. Ruiz and informed him of my observations and potential for violation for operating without a permit.</p> <p>Mr. Ruiz stated site has an ADEQ permit posted at the fertilizer plant and arranged to call me with the permit number due to potential applicability to my investigation.</p> <p>At 1443 hrs; I telephoned Mr. Ruiz and informed him I would have update regarding my investigation, and telephone him on Thursday, August 14, 2014. Mr. Ruiz stated the posted ADEQ Permit 6363 is a permit to sell fertilizer.</p> <p>At 1446 hrs; I telephoned Mr. Hoenig and informed him I would have update regarding my investigation, and telephone him on Thursday, August 14, 2014.</p> <p>At 1448 hrs; I left voice message for Ms. Yeatts and informed her of the potential for a no-permit violation and informed her I would have update regarding my investigation, and telephone her on Thursday, August 14, 2014.</p> <p>On August 14, 2014; I telephoned Mr. Hoenig, Mr. Ruiz, and Ms. Yeatts; informing each the Department has suspended a compliance determination pending determination from ADEQ regarding applicability of A.R.S. 49-457 to the fertilizer processing. I informed each I would contact them again if the status changed. Ms. Yeatts stated Mr. Ruiz is arranging a permit modification at this time with Department Permit Engineer, Sara Sueberling. I clarified the potential violation as a failure to modify the permit and the proposed permit modification would be the appropriate corrective action should the violation be issued.</p> <p>On August 29, 2014; Department Compliance Manager, Kim Butler routed an email from Department Policy Advisor, Jo Crumbaker stating, "...ADEQ will handle dust complaints regarding the fertilizer process until we receive further clarification back from ADEQ. We will only be handling construction dust complaints and routine inspections or the equipment listed under their existing permit. We will not be working to resolve any complaints or issues with the fertilizer processing unit at this time."</p> <p>Based upon the above communication, I will not make any compliance determination regarding the fertilizer processing activities at the facility but instead will close out this inspection as "No violations noted" -- without prejudice. The Department will re-visit this issue if ADEQ determines that A.R.S. 49-457 is not applicable to the fertilizer processing.</p> <p>Area of concern: Composting activities at the facility may similarly be re-visited for applicability to Maricopa County Air Pollution Control Regulations contingent upon the anticipated determination by ADEQ.</p> <p>On September 2, 2014; I telephoned Mr. Hoenig, Mr. Ruiz, and Ms. Yeatts; informing each of the status of my inspection I will be mailing out today.</p> <p>End report.</p> <p>Additional documents associated with this inspection report as follows:</p> <p>1) Inspection recordings and photos</p> <p>2) Emails</p>

Delivery Method:

Date: 02-Sep-14

Regular Mail

OFFICE USE
rec:
rev: